

UNITED STATES DISTRICT COURT

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

for the

Western District of Arkansas

SEP 05 2019

DOUGLAS F. YOUNG, Clerk

By

Deputy Clerk

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)1304 1/2 Capps Road a.k.a.
1304A Capps Road
Harrison, Arkansas 72601

Case No. 3:19cm22

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT "A," This court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3)(A) and Federal Rule of Criminal Procedure 41

located in the Western District of Arkansas, there is now concealed (identify the person or describe the property to be seized):

SEE ATTACHMENT "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

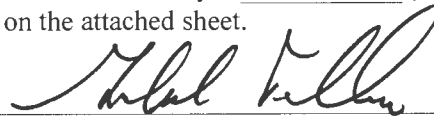
Code Section

Offense Description

Possession/Distribution of Child Pornography

The application is based on these facts:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Gerald Faulkner - HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/5/19


Judge's signature

City and state: Fort Smith, Arkansas

Magistrate Mark E. Ford

Printed name and title

ATTACHMENT A
DESCRIPTION OF PROPERTY TO BE SEARCHED

Any and all structures and outbuildings to include vehicles located on the property or arriving on the property and curtilage of **1304 ½ Capps Road in Harrison, Arkansas 72601, also known as 1304A Capps Road in Harrison, Arkansas 72601** (SUBJECT PREMISES), more particularly described as a single story structure with yellow vinyl and red brick siding. The residence has a metal roof and the front door faces west. There is a wooden privacy fence enclosing the back yard. There is a storage building in the yard to the south of the residence. There is also a mailbox on the south side of the highway with the address 1304A displayed on the side and an asphalt driveway leading from Capps Road to the residence.

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ATTACHMENT B
ITEMS TO BE SEARCHED FOR AND SEIZED

- a. Images of child pornography and files containing images of child pornography in any form wherever it may be stored or found including, but not limited to:
 - i. Any computer, cellular phone, computer system, smart phones, computer tablets, and related peripherals; tapes, cassettes, cartridges, streaming tape, commercial software and hardware, computer disks, disk drives, monitors, computer printers, modems, tape drives, disk application programs, data disks, system disk operating systems, magnetic media floppy disks, hardware and software operating manuals, tape systems and hard drive and other computer related operation equipment, digital cameras, web cams, scanners, computer photographs, Graphic Interchange formats and/or photographs, undeveloped photographic film, slides, and other visual depictions of such Graphic Interchange formats (including, but not limited to, JPG, GIF, TIF, AVI, and MPEG), and any electronic data storage devices including, but not limited to cellular telephones, hardware, software, diskettes, backup tapes, CD-ROMS, DVD, Flash memory devices, and other storage mediums; any input/output peripheral devices, including but not limited to passwords, data security devices and related documentation, and any hardware/software manuals related to or used to: visually depict child pornography; contain information pertaining to the interest in child pornography; and/or distribute, receive, or possess child pornography, or information pertaining to an interest in child pornography, or information pertaining to an interest in child pornography;
 - ii. Books and magazines containing visual depictions of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256;
 - iii. Originals, copies, and negatives of visual depictions of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256; and
 - iv. Motion pictures, films, videos, and other recordings of visual depictions of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256;
- b. Contact information or correspondence (online conversations/ Chats) pertaining to the possession, receipt or distribution of visual depictions of minors engaged in sexually explicit conduct, and/or the sexual solicitation of minors that were transmitted or received using a computer, or some other facility or means of interstate or foreign commerce, common carrier, or the U.S. mail including, but not limited to:
 - i. Electronic mail, internet chat logs, and electronic messages, social media messages, internet posts, blogs or any other internet-based contacts or communications, log in information to child exploitation forums, websites, and chatrooms;

- ii. Envelopes, letters, books, ledgers, diaries, notebooks, notes, and records bearing on the production, reproduction, receipt, shipment, orders, requests, trades, purchases, or transactions of any kind involving the transmission through interstate or foreign commerce including by United States mail or by computer of any visual depiction of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256 or the solicitation of sexual conduct;
- c. Emails, log in information, credit card information, etc showing ownership or use of the premises or device, subscriptions to internet or phone services, or account information and subscriptions to online applications known for child exploitation, paid sites, and social media;
- d. Records or other items which evidence ownership or use of computer equipment found in the above residence, including, but not limited to, sales receipts, bills for Internet access, and handwritten notes.
- e. Any and all computer hardware, to include data-processing devices containing central processing units, such as "desktop", "tower", "laptop" and "notebook" computers, hand-held electronic organizers, "personal digital assistants" and iPod's/iRiver's; "routers", "switchers" "Cellular Phones/Smart Phones" "Tablets" or any similar device which facilitates communication by sending transmissions to intended recipients and has the capability of creating logs; internal and external storage devices, including magnetic storage devices such as hard disk drives, diskette drives, and tape drives, optical storage devices such as CD-ROM drives, CD-R/CD-RW recorders, and DVD drives/recorders, and other memory storage devices such as smart-card readers. In addition, peripherals, equipment that send data to, or receive data from, computer hardware, but do not normally store user data, such as keyboards, mice, printers, scanners, plotters, video display monitors, modems, cables, and certain types of facsimile machines.
- f. Any and all computer software and storage media to include any material capable of storing information in a manner that can be used by computer hardware to save and/or retrieve information, such as diskettes, CD-ROM's, CD-R's, CD-RW's, DVD's, DVD-R's, DVD-RW's, magnetic tapes, ZIP disks, JAZ disks, Peerless disks, SparQ disks, ORB disks, optical disks, smart-cards, EPROMS, and digital memory media such as CompactFlash, SmartMedia, Sony Memory Sticks, and USB "thumb" or "key" drives, in addition to computer photographs, Graphic Interchange formats and/or photographs, cameras, digital cameras, slides, scanners or other visual depictions of such Graphic Interchange format equipment which may be, or are used to visually depict child pornography, child erotica, information pertaining to the sexual interest in children, sexual activity with children, or the distribution, possession or receipt of child pornography, child erotica or information pertaining to an interest in child pornography or child erotica.
- g. Any and all computer-related documentation to include written, recorded, printed, or electronically stored material which explains or illustrates how to configure or use computer hardware, software, or other related items. In addition to passwords, to include alphanumeric strings, pass-phrases, password files, and similar decryption codes necessary to access data that is encrypted or otherwise inaccessible. Any and all security devices, to include physical keys, encryption devices, "dongles", and similar physical items needed to gain access to associated computer hardware.

h. Any and all address books, mailing lists, lists of names and addresses of minors, supplier lists, mailing address labels, and any and all documents and records pertaining to the preparation, purchase, and acquisition of names or lists of names to be used in connection with the purchase, sale, trade, or transmission, through interstate commerce including by United States Mails or by computer, any visual depiction of minors engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256 or minor contacted for sexual purposes.

i. Any data that is encrypted and unreadable will not be returned unless law Enforcement personnel have determined that the data is not (1) an instrumentality of the offense, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offense specified above.

j. In searching the data, the computer personnel may examine and copy all of the data contained in the computer equipment and storage devices to view their precise contents and determine whether the data falls within the items to be seized. In addition, the computer personnel may search for and attempt to recover deleted, hidden, or encrypted data to determine whether the data falls within the list of items to be seized. Finally, the computer forensic personnel may access any and all applications, email accounts, social media, internet search terms and history, and/or documents contained upon any said device to determine relevancy.

ATTACHMENT C

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS

STATE OF ARKANSAS

:
:
:
:
:

ss. AFFIDAVIT

COUNTY OF BOONE

Affidavit in Support of Application for Search Warrant

I, Gerald Faulkner, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”), currently assigned to the Assistant Special Agent in Charge Office in Fayetteville, Arkansas. I have been so employed with HSI since April, 2009. As part of my daily duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, online enticement, transportation, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2251A, 2422(b), 2252(a) and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of numerous search warrants and arrest warrants, a number of which involved child exploitation and/or child pornography offenses. This affidavit is being submitted based on information from my own investigative efforts as well as information obtained from others who have investigated this matter and/or have personal knowledge of the facts herein.

2. This affidavit is being submitted in support of an application for a search warrant

for the premises located at 1304 ½ Capps Road in Harrison, Arkansas 72601, also known as 1304A Capps Road in Harrison, Arkansas 72601 the “**SUBJECT PREMISES**”. As such, it does not include all of the information known to me as part of this investigation, but only information sufficient to establish probable cause for the requested search warrant.

Statutory Authority

3. This investigation concerns alleged violations of Title 18, United States Code, Sections 2252 and 2252A, relating to material involving the sexual exploitation of minors, which has been defined in Title 18 U.S.C. 2256, as an individual under 18 years of age.

a. Under 18 U.S.C. Section 2252(a)(1) (transportation), 2252(a)(2) (receipt and distribution), and 2252(a)(4)(B) and 2252A(a)(5)(B) (possession), it is a federal crime for any person to transport, distribute, receive, and possess child pornography, as that term is defined by federal law. Further under 18 U.S.C. Section 2253(a)(3), a person who is convicted of an offense under 18 U.S.C. Section 2252 or 2252A, shall forfeit to the United States such person’s interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

Computers and Child Pornography

4. “Based upon my knowledge, training, and experience in child exploitation and child pornography investigations, and the experience and training of other law enforcement officers with whom I have had discussions, I know that computers and computer technology have revolutionized the way in which child pornography is produced, distributed and utilized. Prior to the advent of computers and the Internet, child pornography was produced using cameras and film, resulting in either still photographs or movies. The photographs required darkroom facilities and a significant amount of skill in order to develop and reproduce the images. As a result, there were definable

costs involved with the production of pornographic images. To distribute these images on any scale also required significant resources. The photographs themselves were somewhat bulky and required secure storage to prevent exposure to the public. The distribution of these wares was accomplished through a combination of personal contacts, mailings, and telephone calls, and compensation for these wares would follow the same paths. More recently, through the use of computers and the Internet, distributors of child pornography use membership-base/subscription-based websites to conduct business, allowing them to remain relatively anonymous.

5. In addition, based upon my own knowledge, training, and experience in child exploitation and child pornography investigations, and the experience and training of other law enforcement officers with whom I have had discussions, I know that the development of computers has also revolutionized the way in which those who seek out child pornography are able to obtain this material. Computers serve four basic functions in connection with child pornography: production, communication, distribution, and storage. More specifically, the development of computers has changed the methods used by those who seek to obtain access to child pornography in these ways:

6. Producers of child pornography can now produce both still and moving images directly from a common video or digital camera. The camera is attached, using a device such as a cable, or digital images are often uploaded from the camera's memory card, directly to the computer. Images can then be stored, manipulated, transferred, or printed directly from the computer. Images can be edited in ways similar to how a photograph may be altered. Images can be lightened, darkened, cropped, or otherwise manipulated. The producers of child pornography can also use a device known as a scanner to transfer photographs into a computer-readable format. As a result of this technology, it is relatively inexpensive and technically easy to produce, store,

and distribute child pornography. In addition, there is an added benefit to the pornographer in that this method of production does not leave as large a trail for law enforcement to follow.

7. The Internet allows any computer to connect to another computer. By connecting to a host computer, electronic contact can be made to literally millions of computers around the world. A host computer is one that is attached to a network and serves many users. Host computers are sometimes operated by commercial Internet Service Providers (ISPs), such as America Online (“AOL”) and Microsoft, which allow subscribers to dial a local number and connect to a network which is, in turn, connected to the host systems. Host computers, including ISPs, allow e-mail service between subscribers and sometimes between their own subscribers and those of other networks. In addition, these service providers act as a gateway for their subscribers to the Internet or the World Wide Web.

8. The Internet allows users, while still maintaining anonymity, to easily locate (i) other individuals with similar interests in child pornography; and (ii) websites that offer images of child pornography. Those who seek to obtain images or videos of child pornography can use standard Internet connections, such as those provided by business, universities, and government agencies, to communicate with each other and to distribute child pornography. These communication links allow contacts around the world as easily as calling next door. Additionally, these communications can be quick, relatively secure, and as anonymous as desired. All of these advantages, which promote anonymity for both the distributor and recipient, are well known and are the foundation of transactions involving those who wish to gain access to child pornography over the Internet. Sometimes the only way to identify both parties and verify the transportation of child pornography over the Internet is to examine the recipient’s computer, including the Internet history and cache to look for “footprints” of the websites and images accessed by the recipient.

9. The computer's capability to store images in digital form makes it an ideal repository for child pornography. A single floppy disk can store dozens of images and hundreds of pages of text. The size of the electronic storage media (commonly referred to as a "hard drive") used in home computers has grown tremendously with the last several years. Hard drives with the capacity of 160 gigabytes are not uncommon. These drives can store thousands of images at very high resolution. Magnetic storage located in host computers adds another dimension to the equation. It is possible to use a video camera to capture an image, process that image in a computer with a video capture board, and save that image to storage in another country. Once this is done, there is no readily apparent evidence at the "scene of the crime." Only with careful laboratory examination of electronic storage devices is it possible to recreate the evidence trail.

10. It should be noted that Internet Protocol (IP) numbers are unique identifiers leased to internet customers by their ISP's. Although IP numbers are capable of changing over time, only one (1) unique IP number can be assigned to a given customer's computer at any given time. Logs of these leased IP's (and their assigned customer accounts) are stored by ISP's routinely.

11. Your Affiant knows from his own experience and the training and experience of other law enforcement officers that Internet computers identify each other by an Internet Protocol or IP address. These IP addresses can assist law enforcement in finding a particular computer on the Internet. These IP addresses can typically lead the law enforcement officer to a particular Internet service company and that company can typically identify the account that uses the address to access the Internet.

Background Regarding Google Email Accounts

12. Based on my knowledge and experience and information obtained from other law enforcement personnel with training and experience in this area, the following is known about Gmail accounts:

- a. Gmail is a free, advertising supported email service provided by Google. Users may access Gmail as secure webmail.
- b. Gmail initially started as an invitation-only beta release on April 1, 2004 and it became available to the public on February 7, 2007.
- c. Individual Gmail messages, including attachments, may be up-to 25 MB. Gmail has a search-oriented interface and a “conversation view” similar to an Internet Forum.
- d. Users can buy additional storage, shared among Gmail, Google Drive and Google+ Photos, through a monthly subscription plan. As of 2015, storage up to 15 GB is free, and paid plans are available for up to 30 TB for personal use.
- e. Google updated the Gmail inbox with tabs which allow the application to categorize the user’s emails. The five tabs are: Primary, Social, Promotions, Updates and Forums. These tabs also appear in Gmail’s mobile version.
- f. Gmail Mobile is a free service developed to provide access to Gmail from mobile devices. Gmail Mobile offers many of the features as Gmail delivered effectively to smaller, mobile screens.
- g. In 2010, Google commenced its new social networking tool, Google Buzz, which integrated with Gmail allowing users to share links and media, as well as status updates with social media platforms.

Background Regarding Google Drive Accounts

13. Based on my knowledge and experience and information obtained from other law enforcement personnel with training and experience in this area, the following is known about Google Drive accounts:

- a. Google Drive is a file storage and synchronization service created by Google. It allows users to store files in the cloud, share files, and edit documents, spreadsheets, and presentations with collaborators.
- b. For Google Drive to synchronize files between the user's computer and Google Drive storage, the Google Drive 'client' software must be running on the users computer. The client communicates with Google Drive to synchronize data.
- c. Google Drive can be accessed offline on the Google Chrome browser via a Chrome application, which can be installed from the Chrome Web Store. Documents, spreadsheets, presentations and drawings can also be viewed and edited offline through standalone Chrome applications.
- d. Google gives every user 15 GB of online storage space, which is shared across three of its most-used services, Google Drive, Gmail, and Google+ Photos.
- e. Google Drive incorporates a system of file sharing in which the creator of a file or folder is, by default, its owner. The owner can regulate the public visibility of the file or folder. Files or folders can be shared privately with particular users having a Google account, using their @gmail.com email addresses. Sharing files with users not having a Google account requires making them accessible to anybody with the link. This generates a secret URL for the file, which may be shared via email, blogs, etc. Files and folders can also be made public on the internet, which means that they can be indexed by search engines and thus can be found and

accessed by anyone.

Background Regarding Twitter Accounts

14. Based on my knowledge and experience and information obtained from other law enforcement personnel with training and experience in this area, the following is known about Twitter accounts:

- a. Twitter is an online social networking service that enables users to send and read short 140-character messages called “tweets”. Registered users can read and post tweets, but those who are unregistered can only read them. Users access Twitter through the website interface or mobile device application.
- b. Twitter has become internationally identifiable by its signature bird logo. The original logo was in use from its launch in March 2006 until September 2010. A slightly modified version succeeded the first style when the website underwent its first redesign.
- c. Tweets are publicly visible by default, but senders can restrict message delivery to just their followers. Users can tweet via the Twitter website, compatible external applications (such as smartphones), or by short message services. Users may subscribe to other users tweets, this is known as “following” and subscribers are known as “followers”. Users can also “like” individual tweets. Twitter allows users to update their profile via their mobile phone either by text Messaging or applications released for certain smartphone and tablets.
- d. Users can group posts together by topic or type by use of “hashtags”, words or phrases prefixed with a “#” sign. Similarly, the “@” sign followed by a username is used for mentioning or replying to other users. To repost a message

from another Twitter user and share it with one's own followers, a user can click the retweet button within the tweet.

- e. Twitter has mobile applications for iPhone, iPad, Android, Windows 10, Windows Phone, BlackBerry, Firefox OS and Nokia S40. There is also versions of the website for mobile devices, SMS and MMS service.
- f. Individual tweets are registered under unique IDs using software called Snowflake, and geolocation data is added using Rockdove.
- g. Twitter messages are public, but users can also send private messages. Information about who has chosen to follow an account and who a user has chosen to follow is also public, though accounts can be changed to protected which limits this information and all tweets to approved followers.
- h. On June 1, 2011, Twitter announced its own integrated photo-sharing service that enables users to upload a photo and attach it to a tweet right from Twitter. Com. Users now also have the ability to add pictures to Twitter's search by adding hashtags to the tweet.

Summary of the Investigation to Date

15. In November 2018, pursuant to an ongoing child exploitation investigation, Jon ENGLISH was arrested by the Boone County, Arkansas Sheriff's Office (BCSO) on Arkansas state charges for possessing child pornography. The state arrest stemmed from the BCSO receiving and reviewing three (3) Cyber Tip Line Reports from the National Center for Missing and Exploited Children (NCMEC) documented under the following case numbers with accompanied identifying user account information:

Cyber Tip # 29637273

Electronic Service Provider: Twitter, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date of Incident: 03/09/18 at 11:15:45 UTC

URL: <https://twitter.com/TabooPervSmoker/status/972068570279620608>

Email: nolimitssmokepig@gmail.com

IP: 70.178.73.36

Full Name: Taboo Perv Smoker

Location: United States

Description: I ♥ meth addiction and poz sex. I ♥ my smoking fetish and exhibitionism. I really, really ♥ no (age) limits pervs. I NEED sleazy smokers for sick sex

Number of Uploaded Files: 3

**** All files reviewed and confirmed to be child pornography by BCSO detectives ****

Cyber Tip # 37654562

Electronic Service Provider: Tumblr, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date of Incident: 07/30/18 at 15:36:00 UTC

URL: taboosmokepig.tumblr.com

Email: nolimitssmokepig@yahoo.com

User Name: taboosmokepig

IP: 70.178.73.36

Number of Uploaded Files: 17

**** All files reviewed and confirmed to be child pornography by BCSO detectives ****

Cyber Tip # 40888425

Electronic Service Provider: Google, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date of Incident: 09/27/18 at 14:41:29 UTC

User Name: Bad Budd

Mobile Phone: 818-299-3647

Email: cp.corruptperv@gmail.com

IP: 70.178.73.36

Number of Uploaded Files: 1

**** All files reviewed and confirmed to be child pornography by BCSO detectives ****

16. Prior to ENGLISH's state arrest in November 2018, BCSO detectives submitted legal paperwork to Cox Communications in reference to the IP address 70.178.73.36 associated to the three (3) Cyber Tip Line Reports. Returned documents from Cox Communications

revealed the subscriber of IP address 70.178.73.36 as being Linda English with a listed service address of 1304 ½ Capps Road in Harrison, Arkansas. Based on the investigative information, the BCSO sought and executed a state search warrant at the service address and encountered ENGLISH at the residence. ENGLISH was ultimately taken into state custody for possession of child pornography and at the time of his booking into the Boone County, Arkansas Detention Center, provided a personal cellular telephone number of 818-299-3647.

17. In November 2018, your Affiant was contacted by a BCSO detective who requested assistance from HSI Fayetteville, Arkansas Internet Crimes Against Children (ICAC) Task Force Computer Forensic Analysts (CFA) in conducting forensic examinations on ENGLISH's seized electronic devices. Your Affiant informed the BCSO detective the CFAs would assist in the investigation and the seized electronic devices were turned over to the custody of HSI Fayetteville, Arkansas ICAC CFAs along with a newly sought and acquired state search warrant for the items. As of the date of this submitted document, forensic examinations are still ongoing on ENGLISH's seized electronic devices.

18. On or about May 16, 2019, based on the ongoing child exploitation investigation, your Affiant was notified by the Arkansas State Police (ASP) ICAC analyst that additional Cyber Tip Line Reports had been forwarded from the NCMEC regarding newly created online social media accounts believed to utilized by ENGLISH. The online social media accounts, documented as being engaged in possible additional child exploitation violations, were flagged after ENGLISH's arrest by the BCSO in November 2018 and his subsequent release from prison for Arkansas state charges. The ASP ICAC analyst further informed your Affiant there were a total of approximately ten (10) Cyber Tip Line Reports, including the three (3) previously investigated by the BCSO, generated on ENGLISH's online accounts dating back to 2016.

19. Between July and August 2019, your Affiant reviewed ten (10) Cyber Tip Line Reports from the NCMEC in reference to online accounts believed to have been created and utilized by ENGLISH. The following is a review of seven (7) Cyber Tip Line Reports not previously investigated by the BCSO:

Cyber Tip Line Report # 15214294

Electronic Service Provider: Google, Inc.

Incident Information: Child Pornography (possession, manufacture, and distribution)

Date of Incident: 10/30/16 at 07:14:57 UTC

URL: plus.google.com/photos

Email: pdopervpig@gmail.com

Email: wantaboyscouts@gmail.com

Reviewed by Electronic Service Provider: "Information Not Provided by Company"

IP: 70.178.73.36

Number of Uploaded Files: 1

Filename: 2016-10-30.jpg (Electronic Service Provider Did Not Review Contents of File)

Cyber Tip Line Report # 15375959

Electronic Service Provider: Google, Inc.

Incident Information: Child Pornography (possession, manufacture, and distribution)

Date: 11/09/16 at 17:42: 45 UTC

URL: plus.google.com/photos

Email: pdopervpig@gmail.com

Email: wantaboyscout@gmail.com

Reviewed by Electronic Service Provider: "Information Not Provided by Company"

IP: 70.178.73.36

Number of Uploaded Files: 1

Filename: 2016-10-29.jpg (Electronic Service Provider Did Not Review Contents of File)

Cyber Tip Line Report # 30060440

Electronic Service Provider: Google, Inc.

Incident Information: Child Pornography (possession, manufacture, and distribution)

Date: 04/02/18 at 14:47:01 UTC

Additional Information: Content Stored in Google Photos

User Name: Hell Yeah

Email: Nolimitssmokepig@gmail.com

Email: wantsboyscouts@gmail.com

Reviewed by Electronic Service Provider: Yes

IP: 70.178.73.36

Number of Uploaded Files: 1

Filename: report_1324762005518053500

20. Your Affiant reviewed the uploaded file and described it as being an image of an approximate twelve (12) to fifteen (15) year old minor male completely naked sitting on a table with his erect penis exposed to the camera and holding a cigarette in his hand.

Cyber Tip Line Report # 30048368

Electronic Service Provider: Twitter, Inc.

Incident Information: Child Pornography (possession, manufacture, and distribution)

Date: 04/02/18 at 08:58:53 UTC

Additional Information: Tweet

User Name: taboosmokeperv

Email: cp.corruptperv@gmail.com

Full Name: Bad Budd

Location: Arkansas

Description: Smokkking fetish, poz fetish, former bugchaser, lifelong barebacker, tweaker, k9 Incest, shit/piss sex, pedo

Email: taboopervsmoker@gmail.com

Email: taboosmokeperv@gmail.com

Email: cp.corruptpower@gmail.com

Reviewed by Electronic Service Provider: Yes

IP: 70.178.73.36

Number of Uploaded Files: 2

Filename: DZxB5uoW0AlKyAQ.jpg

21. Your Affiant reviewed the uploaded file and described it as being an image of an approximate six (6) to twelve (12) month old infant child with his mouth open and what is believed to be an animal penis inside the mouth of the infant child. There is also what appears to be semen on the mouth and chin of the infant child.

Filename: taboosmokeperv-979968138283507712-2018-04-03-1034288.zip

22. Your Affiant reviewed the zip file which contained Twitter, Inc. file folders of user account images, animated gifs, dm media, profile media, account creation, devices, etc.

23. The “Account Images” folder contained approximately ten pictures one of which depicts a minor male child approximately three (3) to five (5) years of age, clothed and seated in an unknown vehicle, holding what is believed to be a circular tin can of “Grizzly” chewing tobacco. The image is documented under file name **980203599182663680-DZph9ftVoAE9I5.jpg**, and appears to have been taken or created in April 2018. There is another picture contained within the folder depicting what is believed to be the same minor male child, clothed, with a lit cigarette in his mouth. This particular picture is documented under file name **980679077077143552-DZwSakJVQAEc5jh.jpg**, which also appears to have been taken or created in April 2018. Also reviewed were two “selfie” style images of ENGLISH wearing an orange baseball cap and another where he is shirtless with a cigar in his mouth. The final image viewed by your Affiant contained in the folder was a picture of a believed deceased minor male child, approximately four (4) to six (6) years of age lying face down in the surf near a body of water. The picture also contained a separate image of an unknown first responder carrying the believed deceased minor male child off the beach area from the body of water.

24. The “dm media” folder contained a video of ENGLISH with his shirt aside and chest exposed while smoking a cigarette. The audio of the video records ENGLISH talking about “tweaking”, “smoking”, “playing with his tits” and “perving on his cock”.

Cyber Tip # 30646068

Electronic Service Provider: Google, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date: 04/12/18 at 04:50:51 UTC

User Name: Taboo Smoker

Email: tabooervsmoker@gmail.com

Email: wantsboyscouts@gmail.com

Stored in Google Photos

Reviewed by Electronic Service Provider: Yes

IP: 70.178.73.36

Number of Uploaded Files: 1

Filename: REC%2B358.jpg

25. Your Affiant reviewed the uploaded file and described it as being an image of two approximate eight (8) to ten (10) year old minor males both completely naked on a bed. One minor male is kneeling on the bed with his penis exposed to the camera holding the legs of the other child. The other minor male is lying on the bed with his legs being held towards his head and his penis and anus exposed to the camera.

Cyber Tip # 48321612

Electronic Service Provider: Twitter, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date: 03/23/19 at 11:19:53 UTC

User Name: MarlboroPervPig

Email: nolimitssmokepig@yahoo.com

Phone: 1-818-853-8125

IP: 70.178.73.36

Reviewed by Electronic Service Provider: Yes

Full Name: Badd Boyd

Number of Uploaded Files: 2

Filename: VJc6Aw3-.jpg

26. Your Affiant reviewed the uploaded file and described it as being an image of an approximate eight (8) to ten (10) year old minor male completely naked lying on bed with his penis and anus exposed to the camera.

27. The second file reviewed by your Affiant, submitted by Twitter to the NCMEC, were recorded as being multiple chat log conversations between the account name “MarlboroPervPig” and/or “Badd Boyd”, believed to be operated by ENGLISH, recognized by user identification number “**1095147872482406401**”. These conversations involve ENGLISH engaging with multiple unknown online social media users talking about actively or potentially offending on and harming minor children. The following conversations are excerpts pulled from the full chat logs considered to be pertinent to the ongoing child exploitation investigation:

sender_id: 792893718512672772,
recipient_id: 1095147872482406401,
created_at: "Sat Mar 23 11:05:00 +0000 2019",
text: "Nice. Any experience"

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 11:10:49 +0000 2019",
text: *"Youngest was 14."*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 11:11:10 +0000 2019",
text: *"Besides all the little boys I found all the while they slept when they were little boys and I was a teenager."*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 11:11:33 +0000 2019",
text: *"And the few I got my mouth on their cocks. Youngest there was three or four. You?"*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 11:21:23 +0000 2019",
text: *"I want to put I'm holding in my hands in the first picture up inside bodies smaller than the one in the lower picture. Deep and diseased. PedoPozFuck"*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 11:56:58 +0000 2019",
text: *"How little? For me... VERY LITTLE",*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 12:40:00 +0000 2019",
text: *"I have a smoking fetish and I took that picture of him locked in the bathroom of the drug dealer I was living with. The kids saw me on the street asked me for smoke and drove my dick straight up in my pants so I snuck him in after telling him I get in trouble if any adults catch us. I smoked a bunch of meth while he watched because I wanted to be good and horny while we smoked together. I was squeezing my dick through my pants the whole time and thanks to the drugs I was horny & brave enough to tell him you look sexy smoking"*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,

created_at: "Sat Mar 23 12:40:09 +0000 2019",
text: *"And ask if I could take pictures. They're all lost but that One I somehow held onto on the Internet for 20 years. Told him I had to take a piss so I could show him my dick and he did one too."*

sender_id: 1095147872482406401,
recipient_id: 792893718512672772,
created_at: "Sat Mar 23 12:40:18 +0000 2019",
text: *"I jerked off while pissing and he mimicked me then we smoked another and I gave him a pack to take him. Invited him back for more whenever but never saw again. Was going to fuck&mg have sex with that fucker too. Was starting slow was all. Fucked me up I was devastated"*

sender_id: 1095147872482406401,
recipient_id: 1091930754546892800,
created_at: "Sat Mar 23 11:19:20 +0000 2019",
text: *"My eye was sharp enough to realize your profile photo is... Well, not exactly legal"*

sender_id: 1091930754546892800,
recipient_id: 1095147872482406401,
created_at: "Sat Mar 23 11:21:03 +0000 2019",
text: *"Erm... yh maybe not, but it's my nephew and I like the pic"*

sender_id: 1095147872482406401,
recipient_id: 1091930754546892800,
created_at: "Sat Mar 23 11:26:35 +0000 2019",
text: *"Well that was a cute and subtle way of teasing me about your nephew asshole! Don't pull it. Exactly the opposite... Push it, push it real good, push it real deep. Poz him and sleaze him up and send him on a mission to school to fuck around and start a mini epidemic At the junior high. Turn him into a pozpig like us So he'll really do do the work and get that dick and as many children as possible"*

sender_id: 1095147872482406401,
recipient_id: 1091930754546892800,
created_at: "Sat Mar 23 11:33:13 +0000 2019",
text: *"He was tiny and looked 12 years old. I had him pretend that he was for the poz dude do you have the experience sort of a getting to spray disease up a kid that age"*

sender_id: 1095147872482406401,
recipient_id: 1091930754546892800,
created_at: "Sat Mar 23 11:35:19 +0000 2019",
text: *"I was still chasing the bug at that time. Or I may have already been infected and fucked him with that shit and didn't know it. Not the same without knowing.\nDid\nI stress that I'm got him addicted to drugs? I taught him how to cruise online for other adults who would trade drugs for his ass."*

sender_id: 1095147872482406401,

recipient_id: 1091930754546892800,

created_at: "Sat Mar 23 11:37:23 +0000 2019",

text: *"He was so fucking excited and turned on. Our first time together I made him late for the high school graduation where he had to play in the band. He was on the ninth grade. We almost ran into his parents when he was getting out of the car and it was so fucking awesome tweaking and squeezing my dick with a bunch of kids n parents around watching him get out of my car, men shirtless and smoking and surely looking fucked up"*

sender_id: 1095147872482406401,

recipient_id: 1099549882304598016,

created_at: "Sun Mar 24 15:00:14 +0000 2019",

text: *"I've been tearing into my dick and abusing drugs and spreading child rape propaganda for today's on the Internet. Hunting Young faggots never heard anyone talk that way about the boys let alone me bragging about being sexually obsessed with children being physically abused AND fucking sexual abuse. The risk is sending baby and toddler rape porn to them, I'm fucking addicted to it. Ones who call me names and hate me turn me on and fill me with superiority because I love her just too stupid to get it, but it ain't hard to find guys Who listen then look At some toddler porn on their way to learning. Learning and changing From who they thought they were into meant like us to it comes to naturally: hurting boys is hot... Because the faggot cock doesn't live live stays rockhard from beginning of them rape to the end And craves more and more"*

sender_id: 1095147872482406401,

recipient_id: 1099549882304598016,

created_at: "Sun Mar 24 15:09:59 +0000 2019",

text: *"One of my fantasies is coming across fresh boy Corpse like his... to sneak off with it and start fucking it the minute it's safe. In private. So I can take my time fucking and fucking and destroying a body having faggot sex with it. Fall in love with him, alternate between talking sweet to it i'm punching it in the face over and over and over Till i'm satisfied I'm fully hooked on it... on fucking dead kid. Make it so there's no way I can go through life without more."*

sender_id: 1095147872482406401,

recipient_id: 1099549882304598016,

created_at: "Sun Mar 24 15:37:31 +0000 2019",

text: *"Do that motherfucker get the fuck off over every picture I see in every story I hear about little kids dying. The best sister a break and violence but so long as it's a boy who is a little hot fuck I would want to actually fuck, and I find out he's dead, I just figure so it was worth him dying for me to get to enjoy a good it makes me feel. To bask how I get to live and got to live decades more than him. That's one of the most inspiring things about wanting my own kill... Loving myself for taking away from him The chance to live that I've gotten. And living have made the decision to do evil."*

sender_id: 1095147872482406401,

recipient_id: 1099549882304598016,

created_at: "Sun Mar 24 15:57:23 +0000 2019",

text: "Are used to plan my dirty needles in the public library's children section, in the middle of blocks where the kids would reach into turn the page and get stuck. Also playgrounds and school yards. I was too busy being a drug dealer in shipping up to know what diseases I had at the time. And I'm jealous as fuck you're where you're at in your life and your depravity that you have the chance to get away with A perfect little sexy crime. Do it man. You know how some people get over the little tiny caskets babies are better in? They just make me wanna rub my dick. Fucker put a baby in a casket. Put it in the ground and he'll always be down there anytime you want to go take a guy to the cemetery and fuck over his grave. \n\nJust think of all the dumb she can take on his headstone... And the note you can leave for the family to find my Memorial Day. Bragging about how much more important your cock is then there baby was."

INVESTIGATORS NOTE: ENGLISH and recipients "792893718512672772", "1091930754546892800" and "1099549882304598016" send numerous internet links back and forth to one another of Twitter, Inc. profiles, all of which are believed to contain images of child pornography.

Cyber Tip # 48681467

Electronic Service Provider: Twitter, Inc.

Incident Information: Child Pornography (Possession, Manufacture, and Distribution)

Date: 03/23/19 at 11:19:53 UTC

User Name: MarlboroPervPig

Email: nolimitssmokepig@yahoo.com

IP: 70.178.73.36

Reviewed by Electronic Service Provider: Yes

Full Name: Badd Boyd

Number of Uploaded Files: 2

Filename: VJc6Aw3-.jpg

28. Your Affiant reviewed the uploaded file and described it as being an image of an approximate eight (8) to ten (10) year old minor male lying on a bed completely naked. The minor male's legs are spread apart exposing his penis and anus to the camera.

Filename: MarlboroPervPig-1095147872482406401-2019-04-16-1743612.zip

29. Your Affiant reviewed the zip file which contained Twitter, Inc. file folders of user account images, animated gifs, dm media, profile media, account creation, devices, etc.

30. The "Account Images" folder contained approximately one-hundred and twelve pictures with multiple "selfie" style photographs of ENGLISH completely naked and smoking cigarettes. The remaining images consist of naked adult males engaged in sexual activities. The

“dm media” folder contained approximately thirty-five images, many of which were “selfie” style photographs of ENGLISH naked smoking cigarettes. Also contained and reviewed in the “dm media” folder was a “meme” or “gif” entitled “Grooming” with the text of “Online Sexual Predator Manipulation Process & Tactic – Listen, Encourage, Support, Compliment Becomes Sexually Solicit, Sextort & Threaten”. Your Affiant reviewed the “Profile Media” folder which contained a “selfie” photograph, relevant to the ongoing child exploitation investigation, of ENGLISH holding a circular tin can of “Grizzly” chewing tobacco. This is one in the same type brand of chewing tobacco being held by the unknown minor male child depicted in file **980203599182663680-DZph9ftVoAE9I5.jpg** associated to Cyber Tip Line Report # 30048368. The “selfie” photograph of ENGLISH holding the “Grizzly” tobacco can appears to have been taken or created in April 2019.

31. Your Affiant then conducted Department of Homeland Security (DHS) and open source database queries and properly identified ENGLISH as being Jon Clayton ENGLISH with a date of birth in 1973 and being issued the Social Security Administration Number ending in the last four digits 8416. Record checks further revealed ENGLISH is issued an Arkansas driver’s license bearing the last four numbers 3303 which was issued on 04/27/16 and expires on 02/04/24. The address associated to the Arkansas driver’s license is listed as being 1304A Capps Road in Harrison, Arkansas 72601 (**SUBJECT PREMISES**).

32. Upon review of all ten (10) Cyber Tip Line Reports with accompanied Electronic Service Provider information submitted by the NCMEC, it is believed ENGLISH is responsible for the sole creation, utilization, uploading of child pornography and online conversations associated with all respective user accounts. The ten (10) reviewed Cyber Tip Line Reports are all recorded as having been connected to the IP address of 70.178.73.36 which is subscribed to

ENGLISH's current residential address. ENGLISH's confirmed personal cellular telephone number of 818-299-3647, provided at the time of his intake booking in November 2018, is also one in the same documented in Cyber Tip Line Report Number 40888425. Contained within Cyber Tip Line Report Number 48321612, flagged on 03/23/19 at 11:19:53 UTC, there is a specific chat conversation where the sender_id: 1095147872482406401 identifies himself as "My name is English though. Clayton English" with a location of "Arkansas USA here". The sender_id: 1095147872482406401 further states in the same Cyber Tip Line Report that he is "Not sure when the next time will be because I may be on probation soon or even in prison. Under house arrest right now. After six weeks in jail on a child pornography charge. Right now it looks like a good chance I'm gonna stay out of prison but probably register as a sex offender. WOOF." This self-admission by ENGLISH through online chat conversations of his November 2018 state arrest further shows he continues to actively utilize social media accounts to participate in child exploitation violations.

33. Your Affiant then compared ENGLISH's Arkansas driver's license issued under the last four numbers 3303 to all of the "selfie" style images depicted in Cyber Tip Line Report Numbers 30048368 and 48681467 and confirmed them to be one in the same person. Additional confirmation of ENGLISH being one in the same person associated to all of the reviewed Cyber Tip Line Reports is noted through all of the exact same user names and email addresses utilized such as:

pdopervpig@gmail.com
wantaboyscouts@gmail.com
Nolimitssmokepig@gmail.com
Taboosmokeperv
cp.corruptperv@gmail.com
Bad Budd
taboopervsmoker@gmail.com
taboosmokeperv@gmail.com

MarlboroPervPig
Badd Boyd

34. All of the aforementioned listed user names and email addresses also coincide with ENGLISH's obsession or fetish with smoking and pedophilia.

35. On August 26, 2019, your Affiant contacted a representative of Secure Trac which is the company responsible for currently monitoring ENGLISH's home incarceration conditions placed upon him through his state court proceedings on the related child exploitation charges. According to an active ping on 08/26/2018 at 04:01 pm CST through ENGLISH's personal monitoring bracelet, the device sent a positive "Trace GPS (High Confidence)" signal confirming he was presently located at the latitude 36.2332433333 and the longitude 93.12316. Your Affiant confirmed the provided latitude and longitude was geolocated to 1304A Capps Road in Harrison, Arkansas 72601 (**SUBJECT PREMISES**).

Conclusion

36. *Necessity of On-site and Off-site examinations of entire computers or storage media.* Based on my experience and the training and experience of other agents, many of the items sought in this affidavit may be stored electronically. Based on my experience and consultation with computer forensic experts, I know that electronic files can be easily moved from computer or electronic storage medium to another computer or medium. Therefore, electronic files downloaded to or created on one computer can be copied on or transferred to any other computer or storage medium at the same location. In addition, based on my experience, I know that searching computerized information for evidence of crime often requires special agents to seize most or all of a computer system's central processing unit (CPU), input/output peripheral devices, related software, documentation, and data security devices, including passwords, so that a qualified

computer expert can accurately retrieve the system's data in a laboratory or other controlled environment. This is true because of the following:

(a) Volume of evidence: Computer storage devices such as hard disks, diskettes, tapes and laser disks, can store the equivalent of thousands of pages of information. This sorting process can take up to several months to complete, depending on the volume of data stored. Therefore, it would also be impractical to attempt this type of data search on site.

(b) Technical requirements: Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data. In any event, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional destruction (both from external sources and from destructive code embedded in the system such as a "booby trap"), a controlled environment is essential to its complete and accurate analysis.

37. Therefore, authorization is sought in this application to seize the items set forth in attachment "B" that are found on the premises to be searched, in order to examine those items for evidence. If it is determined that data has been seized that does not constitute evidence of the crimes detailed herein, the government will return said data within a reasonable time.

38. Based on my experience and the training and experience of other agents involved with this investigation, your affiant knows that individuals involved in the sexual exploitation of children through child pornography almost always keep copies of their sexually explicit material.

Among the reasons copies are maintained is because child pornography is illegal to openly purchase, and the most common method of acquiring it is by trading with other people with similar interests. It is also known that due to the inherent illegality of these sexually explicit materials, they are most often kept in a place considered secure, usually a residence, to avoid detection by law enforcement.

39. Based on the foregoing information, probable cause exists to believe there is located at 1304 ½ Capps Road in Harrison, Arkansas 72601, also known as 1304A Capps Road in Harrison, Arkansas 72601, the **SUBJECT PREMISES**, evidence of violations of Title 18, United States Code, Section 2252, et seq. Your Affiant prays upon his honorable court to issue a search warrant for the SUBJECT PREMISES for the items set forth in attachment “B” (which is attached hereto and incorporated herein by reference), that constitute evidence, fruits, and instrumentalities of violation of Title 18, United States Code, Section 2252, et seq.



Gerald Faulkner, Special Agent
Homeland Security Investigations

Affidavit subscribed and sworn to before me this 5th day of September 2019



Mark E. Ford
United States Magistrate Judge